

Accreditation Proposal

Accreditation Overview

For a plan to be considered a Qualified Health Plan, the Health Benefit Exchange (HBE) must verify that the plan has met certain criteria. One such criterion is accreditation by an entity that HHS recognizes for accreditation of health plans.

In preparation for a meeting with accreditation experts, HBE staff reviewed NCQA and URAC accreditation. An initial proposal for discussion is presented below. The proposal contains specific questions that need your input. After receiving your input, staff will likely revise the HBE's proposal.

Draft Accreditation Proposal for Discussion

ID	Proposal for Discussion
1.	<p>Accreditation on January 1, 2014</p> <p>HBE would like to discuss how to recognize current accreditation among issuers who will participate in HBE.</p> <p>Questions for experts</p> <p>A. To satisfy the criteria on January 1, 2014, should an issuer meet a minimum level of accreditation by NCQA or URAC and should that minimum level consist of all or some of these?</p> <p>For NCQA:</p> <ul style="list-style-type: none"> • Excellent • Commendable • Accredited • Provisional <p>For URAC:</p> <ul style="list-style-type: none"> • Full • Conditional • Provisional <p>B. Should the minimum level of accreditation recognize all programs?</p> <p>C. The Federally-Facilitated Exchange is proposing to recognize accreditation in the Medicaid or Commercial markets, in the same state, for the first three plan years of the Exchange.</p> <ul style="list-style-type: none"> • Does your insurer have existing accreditation in the Medicaid or Commercial markets? • Should Washington recognize accreditation in the Medicaid and Commercial markets? • If not, what existing market and program accreditations should HBE recognize for January 1, 2014 QHP coverage?
2.	<p>Allowing and monitoring an unaccredited issuer to offer QHPs in the HBE</p> <p>Unaccredited issuers may offer QHPs in the HBE. The HBE must, however, establish a timeline by when these issuers must become accredited.</p>

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	<p>The Federally-Facilitated Exchange will allow issuers to be unaccredited when certification is performed in 2013, 2014, or 2015. Those issuers, however, must apply for the "Exchange" accreditation (to be released by July, 2012) and meet these minimum expectations:</p> <ul style="list-style-type: none"> • Schedule accreditation review before the beginning of the certification process held in 2013. • Receive accreditation of QHP policies and procedures on quality by the end of the plan year beginning 2015. <p>A. Should HBE set these minimum expectations?</p> <ul style="list-style-type: none"> • Unaccredited issuers must schedule accreditation before the beginning of the certification processes held in 2013--2015. • Receive accreditation of QHP policies and procedures on quality by the end of the initial plan year in HBE. <p>If the issuer does not achieve Exchange accreditation by the beginning of the recertification process in the issuer's third plan year, then the issuer's QHPs will be denied recertification for the next plan year.</p> <p>B. Should HBE establish that these issuers must achieve one of these statuses?</p> <p>For NCQA:</p> <ul style="list-style-type: none"> • Excellent • Commendable • Accredited • Provisional <p>For URAC:</p> <ul style="list-style-type: none"> • Full • Conditional • Provisional
3.	<p>Monitoring</p> <p>If an issuer loses accreditation or its accreditation expires while offering QHPs, then the HBE will not recertify the issuer's QHPs and the issuer cannot offer QHPs for the next two plan years.</p> <p>A. Is a two-year ban from offering QHPs appropriate? (This is likely a better question for the Plan Management Workgroup.)</p>
4.	<p>Exchange accreditation</p> <p>The HBE will recognize only the Exchange accreditation beginning in the certification / recertification process of 2017.</p> <p>A. Should HBE establish that issuers must achieve and maintain one of these statuses?</p> <p>For NCQA:</p> <ul style="list-style-type: none"> • Excellent • Commendable • Accredited • Provisional <p>For URAC:</p>

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Meeting notes from May 25, 2012 teleconference with quality/accreditation experts

Health Benefit Exchange (HBE) staff closed the meeting with four takeaway points. Staff added an additional point, below. In summarizing these meeting points, staff also described where they are "leaning" on each issue after the May 25th teleconference. The leanings will be summarized at the Plan Management Workgroup meeting on May 29th, and likely, again in June 5.

1. Should HBE recognize Market level or Program level accreditation on January 1, 2014? Leaning: HBE should recognize Market, but not Program, level accreditation. This is because there are many different Programs, and some of them, e.g., workers' comp, do not relate well to commercial health insurance. Also, with so many Programs, it becomes possible to achieve accreditation in only one, which is not at the level of achieving Market accreditation. HBE will also provide options for issuers to offer QHPs while achieving accreditation.

2. What status should HBE accept for accreditation? Leaning: HBE should accept Excellent, Commendable, Accredited, or Provisional levels of accreditation for NCQA. HBE should accept Full, Conditional, or Corrective Action levels of accreditation for URAC.

HBE will need to determine if QHPs should continue to be offered if an issuer's status is Suspended or Denied.

3. Capacity of URAC and NCQA to provide timely accreditation services. Leaning: HBE should be able to set timelines for issuer's to achieve the Exchange Accreditation. Both organizations are responding to the need for their services and providing assurances that they are ready to respond to issuers that need their services.

4. Unsure of URAC and NCQA requirements for Exchange accreditation. This makes it difficult to comment on if HBE's timelines will be feasible: Leaning: HBE should be able to set timelines for issuer's to achieve the Exchange Accreditation. Both URAC and NCQA are establishing ways to transition current accreditation to the Exchange accreditation. For example, NCQA is using a process called an Interim Survey to record the policy and procedures of an issuer's current accreditation and validate that those policies and procedures apply to Exchange accreditation.

5. HBE has contacted NCQA to ask if an issuer can achieve Exchange accreditation if the issuer is not offering QHPs through an exchange. If not, then HBE would need to always set a duration policy that establishes by when a new issuer would need to achieve Exchange accreditation. A: NCQA does offer an issuer -- that is not offering QHPs through an Exchange -- a way to achieve Interim Accreditation, and possibly Accreditation, before the issuer begins participating in an Exchange. The HBE will, nonetheless, likely need to continue to set and use a duration policy because a new issuer or new issuer to the state should have the opportunity to become certified as an un-accredited issuer in Washington State and then achieve Exchange accreditation within the timeframe set by the duration policy.

Draft HBE accreditation proposal

1. Initial certification of an issuer's QHPs.

How will HBE designate an issuer as accredited?

HBE will verify accreditation at the time an issuer submits plans for certification in 2013 to be offered as QHPs in 2014.

HBE will recognize Health Plan Accreditation in these two product lines: Commercial and Medicaid.

HBE will recognize the following accreditation Statuses held by an issuer:

NCQA: excellent, commendable, accredited, provisional, or interim. (Interim is a new 18-month Exchange accreditation offered by NCQA.)

HBE will not recognize these NCQA statuses: denied, appealed by issuer, in process, revoked, scheduled, suspended, or expired.

URAC: full, conditional, provisional, or corrective action.

HBE will not recognize this URAC status: denial.

Unaccredited Issuers

An issuer that is not accredited or has an accreditation that does not satisfy the Health Plan Accreditation recognized by HBE at initial certification can become certified as an unaccredited issuer by meeting the following:

The issuer must be Scheduled to achieve Exchange accreditation in the plan types (HMO, MCO, POS, PPO) the issuer will use to offer QHPs.

The issuer must achieve accreditation before the beginning of the third certification process after the issuer began offering QHPs. For example, if an unaccredited issuer began offering QHPs in 2014, then it would need to become accredited by the beginning of the 2016 certification process.

2. Monitoring

An accredited QHP issuer that has not yet achieved Exchange accreditation status must achieve the Exchange accreditation by its next renewal date.

If an unaccredited issuer fails to achieve accreditation in the time established by URAC or NCQA, then the HBE will not recertify the issuer's QHPs and the issuer cannot offer QHPs for the next two plan years.

If an issuer loses accreditation by not maintaining one of the URAC or NCQA accreditations listed above, then the HBE will not recertify the issuer's QHPs and the issuer cannot offer QHPs for the next two plan years.